

# Voytas & Company

One North Taylor Avenue, Saint Louis, Missouri 63108  
314.932.1068 / [www.voytaslaw.com](http://www.voytaslaw.com)

**Invoice #:** CONWAYC01  
**Case:** Crystal Conway v. Michael Varady et al.  
**Hourly Rate:** \$305.00 / \$195.00  
**Billing Increments:** 1/10 Hour  
**Date of Invoice:** 10/31/2013  
**Responsible Attorneys:** Richard A. Voytas, Jr. (RAV), Nathan K. Bader (NKB)

Date	Work Description	Hours Worked/Atty ID	Amount Billed
2/20/2013	Receive telephone call from Crystal Conway regarding complaint about Specified Credit Association and debt collector Don Stone involving calls to her place of employment. Obtain rough timeline from client and schedule in-person meeting.	1.0-RAV	\$305.00
2/27/2013	Meet in person with Crystal Conway. Receive copy of collection letter and loan documents. Discuss history and documentation of title loan debt and collection tactics of Specified and Don Stone since January of 2013. Discuss options for proceeding with lawsuit and discuss valuation of case and timeline for likely resolution.	2.0-RAV	\$610.00
2/28/2013	Conduct research on Specified Credit Association. Discover caller is actually Michael Varady and not Don Stone. Research Specified and Varady for prior violations, reported cases, solvency and ability to satisfy judgment. Locate Cadillac vehicle owned by Varady in addition to real estate in St. Louis County. No assets found for Specified.	1.5-RAV	\$457.50
3/11/2013	Legal Research on recent unreported district court cases on "impersonation of	2.5-NKB	\$487.50

	state official” violations of FDCPA to learn of actionable misrepresentations; conduct additional legal research on letter violations of 1692g’s overshadowing provision and confirm that letter cannot demand payment within dispute period. Telephone client to obtain clarification on communication between Varady and client’s employer.		
3/11/2013	Work on drafting Petition naming Specified and Varady as Defendants including detailed allegations of violations of 1692e and 1692g for calls to place of employment and letter violation of overshadowing rule.	2.5-RAV	\$762.50
3/25/2013	Receive and review returns of service for Defendants Specified and Varady. File with Court.	.5-RAV	\$152.50
4/5/2013	Draft Interrogatories, Requests to Produce, and Requests for Admission to each of Specified and Varady. Draft certificate of service and file.	2.0-RAV	\$610.00
5/1/2013	Travel to St. Charles County Circuit Court, Associate Division, and continue case as per Defendant’s request for time to obtain counsel.	1.5RAV	\$457.50
6/7/2013	Exchange series of emails with opposing counsel Dennis Barton granting Barton’s requested extension of time to respond to discovery requests.	.5-NKB	\$97.50
6/18/2013	Receive email from Barton regarding his inability to appear for status conference and requesting continuance of same. Travel to St. Charles County Circuit Court, Associate Division, and attend docket hearing and continue case accordingly.	2.0-RAV	\$610.00
6/18/2013	Telephone conference with client to advise on status of case and to discuss potential for filing dispositive motion if discovery responses merit the same. Discuss potential with client of obtaining affidavits from witnesses to debt collector’s call to place of employment pretending to be the State of Missouri.	1.0-RAV	\$305.00
6/27/2013	Receive call from client requesting status update. Explain that Defendant will have minimum of thirty days to file responsive pleading or remove case to Federal Court.	.5-RAV	\$147.50

7/2/2013	Begin review of Defendants' discovery responses and take notes on deficient responses.	1.5-RAV	\$457.50
7/2/2013	Begin review of Defendant's documents produced pursuant to Requests for Production. Forward documents to client for her review.	1.0-RAV	\$305.00
7/17/2013	Draft Golden Rule discovery dispute letter to Barton on various discovery deficiencies.	1.0-NKB	\$195.00
7/24/2013	Draft supplemental discovery requests (Interrogatories, Requests to Produce) to Defendants Specified and Varady.	.5-NKB	\$97.50
7/31/2013	Receive and begin review of Defendant's discovery requests submitted to client. Forward to client and have telephone conference with client regarding her obligation to respond and to produce responsive documents.	1.0-RAV	\$305.00
8/5/2013	Conduct detailed interview with witnesses Brandi Saylors and Tawnya Danley, receptionists at Plaintiff's employer, regarding Varady's ruse to call and ask for Plaintiff while pretending to be the State of Missouri with "papers to serve." Learn that Varady's denial of using this tactic is dishonest; two witness accounts matched precisely.	1.5-RAV	\$457.50
8/9/2013	Receive and review Barton's response to Golden Rule letter.	.3-RAV	\$91.50
8/16/2013	Work on drafting responses to discovery requests directed to Plaintiff.	2.0-RAV	\$605.00
8/22/2013	Finalize responses to discovery requests to Plaintiff and review with Plaintiff.	1.5-RAV	\$457.50
8/23/2013	Work on drafting Motion for Summary Judgment against Defendants and Statement of Uncontroverted Facts and Memorandum in Support.	3.5-RAV	\$1067.50
8/27/2013	Continue work on drafting Memorandum in Support of Motion for Summary Judgment. Obtain affidavit from Plaintiff.	2.5-RAV	\$762.50
8/30/2013	Prepare exhibits to Motion for Summary Judgment. Finalize and file Motion, Statement of Facts, and Memorandum in Support.	1.0-RAV	\$305.00
9/9/2013	Receive angry call from client about letter just received from Dennis Barton regarding the title loan that Specified and Varady were collecting. Barton advises Plaintiff	1.0-RAV	\$305.00

	that he is pursuing her personally. Client convinced that letter is in retaliation for seeking summary judgment. Discuss with client options for proceeding and elect to leave state court venue for refile in United States District Court so that ex-parte contact with client will not be tolerated. Receive letter from client via email.		
9/9/2013	Meet with witnesses Saylor and Danley and obtain detailed affidavits regarding Varady's impersonation of the State.	2.0-RAV	\$610.00
9/12/2013	Re-Draft Complaint for filing in United States District Court including affidavits of Saylor and Danley as exhibits.	1.0-RAV	\$305
9/30/2013	Receive Offer of Judgment from Defendants for double the amount of statutory damages (\$2000) available under the Act plus attorneys' fees. Meet with Crystal Conway and discuss in detail the Offer of Judgment and the consequences of acceptance and rejection.	1.5-RAV	\$457.50
10/3/2013	Receive telephone call from Crystal Conway with additional questions regarding Offer of Judgment. Receive instructions to accept Offer. File Notice of Acceptance with Court.	1.0-RAV	\$305.00
<b>TOTAL DUE</b>			<b>\$12,091.50</b>